

Mecklenburg County Air Quality  
Stage I  
Gasoline Dispensing Facility (GDF)  
Compliance Guidance  
Workshop

May 21, 2012

“Tell me and I forget.  
Teach me and I remember.  
Involve me and I learn.”

Benjamin Franklin

# Presentation Topics:

- Applicable AQ Regulations
- Application Forms To File
- Notifications
- Performance Tests
- Recordkeeping and Reporting
- Inspections
- Compliance and Enforcement

# APPLICABLE AQ REGULATIONS

# Applicable AQ Regulations

- MCAPCO Regulation 2.0928 – “Gasoline Service Stations Stage I” and
- 40 CFR 63  
“Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities” (amended on 1/24/11)

# MCAPCO Regulation 2.0928

**NO CHANGES !**

40 CFR 63, SUBPART CCCCCC

**NO CHANGES !**



Permit Applicability Determinations  
Are Based Upon MCAPCO 2.0928,  
NOT 40 CFR 63, Subpart CCCCCC

Do I need a Stage I permit?



# Obtain A Permit From MCAQ When...

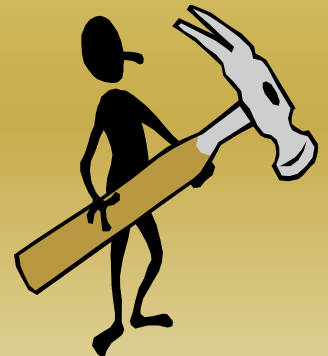
(Per MCAPCO 2.0928)

- Unpermitted Gasoline Dispensing Facility (GDF) dispenses > 50,000 gallons/year of gas;
- Install new gasoline storage tank(s) at a new or an existing, permitted GDF  
(Above ground or Underground);
- Facility undergoes “reconstruction”

# Reconstruction

## Reconstruction:

- replaced components exceed 50 % of the cost of construction of a comparable, new source ; and
- it is technologically and economically feasible for the reconstructed, affected source to meet the relevant standards of Section 112 of the Clean Air Act (i.e., hazardous air pollutants)



APPLICATION FORMS TO FILE

# Application Forms To File

**New construction, “reconstruction” or new gasoline storage tanks:**

File completed S-1 and S-2 application forms and a \$100 application processing fee

# Application Forms To File

## **Legal name / ownership change:**

File a completed S-3 application form and a \$100 application processing fee

# Zoning Determination

A Zoning Determination letter is required if:

- a brand, new Stage I GDF will be constructed; or
- an existing, permitted facility adds a process which has not undergone Zoning review

<http://airquality.charmeck.org>

File path:

- Permitting & Regulations
- Forms
- Miscellaneous Application Forms
- Zoning Determination Process



# Zoning Determination

Zoning Determination confirmation:

- Letter from the appropriate zoning official describing facility and stating it is consistent with zoning ordinance **OR**
- File Zoning Consistency Determination Form with appropriate zoning official

# Application Forms and Confidentiality

## Trade Secret Information On Application

- Submit two (2) copies of the application
- Public Copy: Trade Secret Information Deleted
- Confidential Copy: Fill out entire application

National Emission  
Standards For  
Hazardous Air Pollutants:  
Gasoline Dispensing  
Facilities (GDF)  
40 CFR 63, Subpart CCCCCC  
(6C)  
(as amended 1/24/11)

# The Subpart 6C Timeline

- Original 6C final rule adopted 1/10/08
- Amended 3/7/08, 6/25/08 and 1/24/11



# GDF Affected Source Categories

**Existing:** A GDF constructed before  
11/10/06

**New:** A GDF constructed after  
11/9/06

# GDF Affected Source Categories

Three (3) categories exist:

- < 10,000 gallons/month gasoline throughput (see 6C, 63.11116)
- $\geq$  10,000 gallons/month gasoline throughput (see 6C, 63.11117)
- $\geq$  100,000 gallons/month gasoline throughput (see 6C, 63.11118)

# Universal 6C Requirements

All GDF's:

- Comply with management practices;
- Provide gas loading records within 24 hours;
- Comply by applicable dates; and
- Submit required Notifications

# NOTIFICATIONS



# Initial/Compliance Status Notifications

These notifications **are not required** to be submitted if:

- GDF's permitted by MCAQ prior to 1/10/08
- Existing facility operates in compliance with applicable Air Quality regulations
- GDF dispensing  $\leq 100,000$  gallons/month into non-motor vehicle fuel tanks

# Initial/Compliance Status Notifications

These notifications are **required to be submitted** if:

- **New Affected Source** – GDF commencing construction **after** 11/9/06
- New or Reconstructed GDF must submit Initial and Compliance Status notifications to MCAQ and EPA
- GDF dispensing  $\geq 100,000$  gallons/month into fuel tanks other than motor vehicles
- One form may contain information for both

# Monthly Throughput

- Summing the volume of gasoline loaded into, or dispensed from (i.e., not both) all storage tanks during the current day, plus the total volume of gasoline loaded or dispensed from all storage tanks during the previous 364 days, then divide that sum by 12.
- NOTE: This applies to any sequential 365 day time period, not just a calendar year.

# Monthly Throughput

**New GDF:** Projected monthly throughput

**Existing/Reconstructed GDF:**

Actual Monthly Gasoline Throughput =

1 day gas volume + previous 364 days / 12

# Monthly Throughput

Example Calculation:

Pump 'Em Fast, owned by Speed Dial,  
is always busy.

8,000 gals. = Daily tank loading (5/5/12)

2,912,000 gals. = Previous 364 days loading  
(5/6/11 through 5/4/12)

2,920,000 gals./yr. = Sum of total gas loaded

2,920,000 gals./yr. / 12 mos./yr. =

**Monthly Throughput of 243,333 gallons, is  
> 100,000 gals./mo., subject to 6C 63.11118**

“Time is money.”

Benjamin Franklin

# PERFORMANCE TESTS

# Performance Tests

Performance Tests for GDF's required to test:

➤ CARB TP - 201.1E

Leak Rate/Cracking Pressure of PV Vent Valve

**AND EITHER**

➤ CARB TP- 201.3 **OR** BAAQMD ST-30

Measurement of static pressure/vapor tightness of the vapor balance system with P/V valve(s)



# Performance Tests Timeline

Subject affected source must:

- Conduct Performance Test on installed vapor balance system **no later than 180 days of startup**
- Submit to MCAQ:
  - Test Notification Form - **60 days prior to test date**
  - Test Results - **within 60 days after the test date**
- **Triennial re-test: Written request from MCAQ!**

# Compliance Target Dates

**Existing GDF:** Moves to higher gas category;  
keep gas records and **comply by 1/10/11**

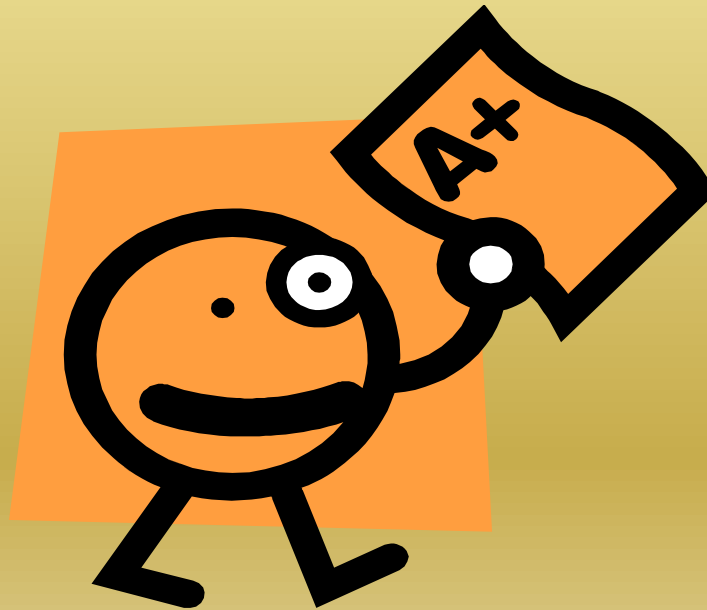
**New/Reconstructed GDF:** Starting between  
11/9/06 – 9/23/08, **comply by 9/23/08**

**New/Reconstructed GDF:** Starting after 9/23/08  
**comply upon startup**

“Any activity becomes creative when the doer cares about doing it right or better.”

John Updike

# RECORDKEEPING AND REPORTING



# Recordkeeping and Reporting

**(Per 40 CFR 63, Subpart CCCCCC rule)**

- File **Initial / Compliance Status Notification**  
(as applicable)
- File **Malfunction Report by 3/15** of the following year for previous year (**IF** malfunctions occurred);
- File **Performance Test Notification form and test results**  
(as applicable)

**(Permit Requirement)**

- File **Annual Gasoline Dispensing Report by 4/30**  
of the following year for the preceding year

“I always thought that record  
would stand until it was broken.”

Yogi Berra

# Mecklenburg County Air Quality

## Stage I

### Inspections, Compliance and Enforcement

# Inspections

- Conduct monthly monitoring of the vapor balance system equipment [i.e., fill tube caps, vapor recovery valves, vent riser valve(s)]
- MCAQ may review monitoring records during the inspection or request that they be submitted by a certain date





# Equipment Inspected

- Fill tube caps
- Submerged fill tube depth
- Vapor balance system valve(s)
- Pressure vent riser vent valve



# Fill Tube Caps

- Cap and gasket present
- Cap closes & seals tightly
- Closed cap does not turn all the way around
- Cap is not cracked or otherwise broken
- Gasket present, right size for the cap, worn

# Submerged Fill Tubes

Dual point or spring / fixed coaxial submerged fill tubes:

- Present, not damaged
- Correct distance above the bottom of the storage tank
- Review records if submerged fill tube is too high, but facility opted to prove opening is covered
- Install a non-coaxial fill tube on new gas UST's

# Vapor Balance System Valves

Fixed / spring coaxial systems:

- Tight sealing cover cap with gasket
- Fill tube is not damaged
- Maintain underground and above ground vapor balance system valves (if both exist)

# Vapor Balance System Valves

Dual point systems:

Each gasoline storage tank vapor balance system valve/gasket must **close and seal tightly**

# Pressure Vent Riser Vent Valves

- Present atop vent riser(s)
- Subpart 6C compliant vent valve present **IF** the GDF has to conduct performance testing

# Truck Tank Gasoline Deliveries

- Truck tank has a current NC DENR vapor tightness testing decal
- Hoses connected to the vapor balance system

# Compliance

Regular inspections conducted by:

- facility staff
- equipment monitoring / service / testing vendors
- gasoline truck tank delivery personnel
- various regulatory inspections, including those conducted by MCAQ
- all help to confirm compliance status



# Procedural Compliance

- Procedural compliance is important
- Properly processing all business and government paperwork is essential to successful , compliant operations

# Annual Invoice Fee

**MCAQ issues permits that do not expire!**

The facility must pay an Annual Administering and Compliance Monitoring Fee to maintain the issued permit and renew the privilege of retaining it.



**Invoice issued mid-December is due by the end of January of the following year!**

# Permit Verification Form

The purpose of the Permit Verification Form is:

- To confirm the GDF's desire to retain the permit and maintain correct information
- To promote compliance at the GDF

# Enforcement

MCAQ takes appropriate enforcement action for equipment and procedural violations.

Actions taken include, but are not limited to:

- Late Fee letters
- Notice of Violation letters
- Civil Penalties
- Permit revocation
- Legal remedies



“If you tell the truth, you don’t  
have to remember anything.”

Mark Twain

Questions?